

EXHIBIT A

Brett Foster (#6089)
Mark Miller (#9563)
Tamara L. Kapaloski (#13471)
DORSEY & WHITNEY LLP
111 S. Main Street, Suite 2100
Salt Lake City, UT 84111
Telephone: (801) 933-7360
Facsimile: (801) 933-7373
foster.brett@dorsey.com
miller.mark@dorsey.com
kapaloski.tammy@dorsey.com

Attorneys for Plaintiff BLENDTEC, INC.

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF UTAH, CENTRAL DIVISION**

BLENDTEC, INC., a Utah corporation,

Plaintiff,

vs.

BLENDJET INC., a Delaware corporation,
MAVORCO HOLDINGS, LLC, a Delaware
limited liability company, MAVORCO IP,
LLC, a Delaware limited liability company,
and MAVORCO OPERATIONS, LLC,
DELAWARE limited liability company,

Defendant.

**DECLARATION OF TAMARA L.
KAPALOSKI, ESQ. IN SUPPORT OF
BLENDTEC, INC.'S MOTION FOR
ENTRY OF DEFAULT**

Civil No. 2:25-cv-00096-RJS-DBP

Judge Robert J. Shelby

Magistrate Judge Dustin B. Pead

DECLARATION OF TAMARA L. KAPALOSKI, ESQ.

I, Tamara L. Kapaloski, declare as follows:

1. I am over the age of eighteen.
2. I am one of the attorneys representing Plaintiff Blendtec, Inc. ("Blendtec") in this action.

3. Because it is a corporation, Defendant Blendjet Inc. (“Blendjet”) is not an infant, in military service, or an incompetent person.

4. Blendjet was served with the Summons and Complaint on or about February 20, 2025, via personal service on its registered agent, as authorized by Fed. R. Civ. P. 4. *See* ECF No. 13.

5. Blendjet has failed to plead or otherwise defend against Blendtec’s Complaint.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on April 23, 2025

/s/ Tamara L. Kapaloski
Tamara L. Kapaloski

CERTIFICATE OF SERVICE

I hereby certify that on the 23rd day of April, 2025, I electronically filed the foregoing with the Clerk of Court using the Court's CM/ECF system, which will send electronic notification to counsel of record.

/s/ Tamara L. Kapaloski